

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

IN RE:

GRAND JURY PROCEEDINGS

Grand Jury Room No. 2  
United States District Court  
for the District of Columbia  
3rd & Constitution, N.W.  
Washington, D.C. 20001

Friday, July 17, 1998

The testimony of ROBERT C. FERGUSON was taken in  
the presence of a full quorum of Grand Jury 97-4, impaneled  
on December 5, 1997, commencing at 2:43 p.m., before:

ROBERT J. BITTMAN  
SOLOMON WISENBERG  
JACKIE M. BENNETT, JR.  
Deputy Associate Independent Counsel  
TIMOTHY SUSANIN  
MARY ANNE WIRTH  
EDWARD J. PAGE  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490 North  
Washington, D.C. 20004

PROCEEDINGS

Whereupon,

ROBERT C. FERGUSON

was called as a witness and, after having been first duly  
sworn by the Foreperson of the Grand Jury, was examined and  
testified as follows:

EXAMINATION

MR. PAGE: All right. Mr. Foreperson, may I begin?

THE FOREPERSON: Actually, it's Madam.

MR. PAGE: I'm sorry. Madam Foreperson, may I  
begin?

THE FOREPERSON: Yes, you may. Thank you.

MR. PAGE: Thank you.

I'd like the record to reflect that we have a  
quorum and, is it true, Madam Foreperson, that there are no  
unauthorized individuals in the grand jury room?

THE FOREPERSON: Yes.

MR. PAGE: Thank you.

BY MR. PAGE:

Q Mr. Ferguson, my name is Edward J. Page. I have  
the honor and privilege of working for Mr. Starr, who is the  
Independent Counsel in regard to certain matters. Do you  
understand that?

A Yes, sir. I do.

Q Thank you. This is what's called a grand jury and

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WITNESS:

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Robert C. Ferguson

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you are in front of a group of citizens here to answer some  
questions that I will be asking you. All right?

There is a court reporter present. He's seated to  
your right. That's not a microphone. He is recording what  
you're saying and what I'm saying and what questions the  
grand jurors might have of you, should they have any.

A Yes, sir.

Q Do you understand?

A Yes, sir.

Q All right. Before I ask you the questions that we  
have for you, I need to explain some things for you. If at  
any time you have a question about those, please interrupt  
because it's easier to deal with questions when they arise  
rather than if you save them.

First of all, any things that would prevent you  
from testifying here today? For example, you don't have any  
hearing problems?

A No, sir. I have no reason.

Q All right. Do you understand what we're talking  
about today? You've been following so far?

A Yes, sir.

Q All right. Do you understand, number one, that  
what goes on today in front of the grand jury, the questions  
and the answers, are secret under law and that none of the  
people here except one can tell other people what happens in